

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,)	
)	Case No. 2:15-cv-11461-GAD-EAS
Plaintiff,)	
)	
v.)	
)	
SYED N. AHMED; NASAH INC.;)	
MILLINIUM FINANCIAL SOLUTIONS,)	
INC.; MARS, INC.-HAMTRAMCK; MAHAD)	
INC.; all d/b/a LIBERTY TAX SERVICE,)	
)	
Defendant.)	
_____)	

STIPULATION FOR ENTRY OF CONSENT JUDGMENT AND
PERMANENT INJUNCTION ORDER

Plaintiff United States of America, through its undersigned counsel, and defendants Syed N. Ahmed, Nasah, Inc., Millinium Financial Solutions, Inc., Mars, Inc.-Hamtramck, and Mahad, Inc., all doing business as Liberty Tax Service, through undersigned counsel, stipulate and agree as follows:

1. On April 22, 2015, the United States filed a Complaint for Permanent Injunction and Other Relief under 26 U.S.C. §§ 7402, 7407, and 7408 (the Internal Revenue Code ("I.R.C.)) against defendants. (*See* Compl. ECF No. 1.) On July 27, 2015, Defendants filed an Answer and Affirmative Defenses denying the allegations in the Complaint. (*See* Ans. Compl. ECF No. 16).

2. Without admitting liability, Defendants nevertheless wish to resolve this matter and they hereby consent to entry of judgment in the above-captioned case and entry of the following Permanent Injunction Order against them.
3. This Court has subject-matter and personal jurisdiction over the defendants.
4. Entry of this Consent Judgment and Permanent Injunction Order will resolve only this civil injunction action, and neither precludes the government from pursuing any other current or future civil or criminal matters or proceedings, nor precludes defendants from contesting liability in any matter or proceeding.
5. The parties waive the entry of findings of fact and conclusions of law under Rules 52 and 65 of the Federal Rules of Civil Procedure.
6. The Permanent Injunction Order will be entered under Federal Rule of Civil Procedure 65 and will constitute the final judgment in this matter. The defendants waive the right to appeal from this judgment and will bear their respective costs, including any attorney's fees or other expenses of this litigation.
7. This Court should retain jurisdiction over this matter for the purpose of implementing and enforcing the Permanent Injunction Order. If defendants violate the Permanent Injunction Order they may be subject to civil and criminal sanctions for contempt of court.

8. Defendants consent, without further proceedings, to immediate revocation of all Preparer Tax Identification Numbers (“PTINs”) and Electronic Filing Identification Numbers (“EFINs”) held by, assigned to, or used by defendants. Defendants consent to disbarment from practice before the Internal Revenue Service in any capacity.

PERMANENT INJUNCTION ORDER

IT IS HEREBY ORDERED that Defendants Syed N. Ahmed, and Nasah, Inc., Millinium Financial Solutions, Inc., Mars, Inc.-Hamtramck, and Mahad, Inc., all doing business as Liberty Tax Service, are **PERMANENTLY ENJOINED**, pursuant to I.R.C. §§ 7402(a), 7407, and 7408, effective from the date of entry of this Order, from directly or indirectly:

- a. acting as a federal tax return preparers, or filing, assisting in, or directing the preparation or filing of federal tax returns, amended returns, or other related tax documents or forms for any person or entity other than Syed N. Ahmed’s own personal tax returns;
- b. assisting, participating, or acting in concert with, any of defendants’ representatives, agents, servants, employees and anyone in active concert or participation with them in the preparation or filing of federal tax returns, amended returns, or other related tax documents or forms for any person or entity;

- c. filing, providing forms for, or otherwise aiding and abetting the filing of IRS Forms 1040, 1040X, 8867, 8863, Schedule C, or any other IRS forms containing false or fabricated information;
- d. advising taxpayers to violate internal revenue laws or unlawfully evade the assessment or collection of their federal tax liabilities, including the misuse of IRS Forms 1040, 1040X, Schedule C, or other IRS forms by inputting false or fabricated information;
- e. owning, managing, controlling, working for, profiting from, or volunteering for a tax-return-preparation business;
- f. seeking permission or authorization (or helping or soliciting others to seek permission or authorization) to file tax returns with an IRS Preparer Tax Identification Number (“PTIN”) and/or IRS Electronic Filing Identification Number (“EFIN”), or any other IRS service or program by which one prepares or files tax returns;
- g. using, maintaining, renewing, obtaining, transferring, selling, or assigning any PTIN(s) or EFIN(s);
- h. representing anyone other than Syed N. Ahmed before the IRS; and
- i. engaging in any other conduct that is subject to penalty under the Internal Revenue Code or that interferes with the proper administration and enforcement of the internal revenue laws.

IT IS FURTHER ORDERED that the United States may engage in post-judgment discovery to monitor compliance with this injunction.

IT IS FURTHER ORDERED that this Court shall retain jurisdiction over this action for purposes of implementing and enforcing the final judgment and any additional orders necessary and appropriate to the public interest.

IT IS SO ORDERED.

This 16th day of November, 2015.

s/Gershwin A. Drain
United States District Judge

APPROVED AS TO FORM AND CONTENT:

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s/Erin Lindgren

s/ John F. Harrington

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Attorney for Defendants

Dated: 11/12/2015

*Attorneys for the United States of
America*

11/13/2015

Dated: _____

s/Syed N. Ahmed

Syed N. Ahmed

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Dated: 11/12/2015

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